State: Pennsylvania Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: HI372 - TLIC RINC 2021 - UNI2

Project Name/Number: Transam/77/77

#### Filing at a Glance

Company: Transamerica Life Insurance Company

Product Name: HI372 - TLIC RINC 2021 - UNI2

State: Pennsylvania

TOI: LTC03I Individual Long Term Care

Sub-TOI: LTC03I.001 Qualified

Filing Type: Rate - Other (Not M.U. or G.I. Product)

Date Submitted: 12/22/2021

SERFF Tr Num: AEGB-133092985

SERFF Status: Assigned

State Tr Num: AEGB-133092985

State Status: Received Review in Progress

Co Tr Num: HI372

Effective

Date Requested:

Author(s): Suzanne Schaake, Doug Simino, Laura Aleman, Daniel Anderson, Marilyn Odell, Drew

Malcolm, DeAnn Stead, Sean Cox, Claire Miller, Teresa Saling, Anita Dulmes, Cathy Wynn,

Madison Snavely

Reviewer(s): Jim Laverty (primary)

Disposition Date:
Disposition Status:
Effective Date:

State Filing Description:

Proposed 52.72% increase on 259 policyholders of Transamerica LTC form ICC10 TLC-3 (the UniProduct Series).

SERFF Tracking #: AEGB-133092985 State Tracking #: AEGB-133092985 Company Tracking #: HI372

State: Pennsylvania Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: HI372 - TLIC RINC 2021 - UNI2

Project Name/Number: Transam/77/77

#### **General Information**

Project Name: Transam/77 Status of Filing in Domicile: Not Filed

Project Number: 77 Date Approved in Domicile: Requested Filing Mode: Review & Approval **Domicile Status Comments:** Explanation for Combination/Other: Market Type: Individual Submission Type: New Submission Individual Market Type:

Overall Rate Impact: 52.72% Filing Status Changed: 12/22/2021 State Status Changed: 12/22/2021

Deemer Date: Created By: DeAnn Stead

Submitted By: Claire Miller Corresponding Filing Tracking Number:

State TOI: LTC03I Individual Long Term Care

Filing Description:

TRANSAMERICA LIFE INSURANCE COMPANY

NAIC: 468-86231

We have been retained by Transamerica Life Insurance Company to submit this filing.

Enclosed for your formal review and approval is the revised actuarial memorandum and rates. A rate increase has previously been approved by the Department for the below policy form.

The rate filing is a request for an increase on the base policy and all associated riders/endorsements. Please refer to the enclosed letter from our actuary for detailed information regarding the rate increase request.

Individual long term care policy ICC10 TLC-3, et al was approved by the Interstate Compact on 4/01/2011 under SERFF Tracking # AEGJ-126930059, State Tracking # IC10-00320.

Note that the Contingent Benefit Upon Lapse Endorsements that will be used were approved under the Interstate Compact filing referenced above (ICC10 TLC-3-CN-E and ICC10 TLC-3-CNLP-E).

Note that the Benefit Reduction and Cost Sharing Endorsement form, TELT13-0121, approved 8/30/21 under SERFF Tracking # AEGB-132770699 will be used with this filing.

No part of this filing contains any unusual or possibly controversial items from normal company or industry standards.

To the best of our knowledge, this filing is complete and intended to comply with the insurance laws of your jurisdiction.

If you have any questions, please feel free to contact the undersigned at (816) 391-2753.

Claire Miller, CPCU, AIC Filing Unit Manager claire.miller@firstconsulting.com

#### Company and Contact

#### **Filing Contact Information**

Claire Miller, Filing Unit Manager claire.miller@firstconsulting.com State: Pennsylvania Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

**Product Name:** HI372 - TLIC RINC 2021 - UNI2

Project Name/Number: Transam/77/77

929 Walnut 816-391-2753 [Phone] Suite 300 816-391-2755 [FAX]

Kansas City, MO 64106

**Filing Company Information** 

Transamerica Life Insurance CoCode: 86231 State of Domicile: Iowa

Company Group Code: 468 Company Type: 6400 C Street SW Group Name: State ID Number:

Cedar Rapids, IA 52499 FEIN Number: 39-0989781

(319) 355-8511 ext. [Phone]

State: Pennsylvania Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

**Product Name:** HI372 - TLIC RINC 2021 - UNI2

Project Name/Number: Transam/77/77

#### **Filing Fees**

#### **State Fees**

Fee Required? No Retaliatory? No

Fee Explanation:

SERFF Tracking #: AEGB-133092985 State Tracking #: AEGB-133092985 Company Tracking #: HI372

State: Pennsylvania Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

**Product Name:** HI372 - TLIC RINC 2021 - UNI2

**Project Name/Number:** Transam/77/77

#### **Rate Information**

Rate data applies to filing.

Filing Method: SERFF

Rate Change Type: Increase

Overall Percentage of Last Rate Revision: 20.000%

Effective Date of Last Rate Revision: 02/19/2019

Filing Method of Last Filing: SERFF

SERFF Tracking Number of Last Filing: AEGB-131704842

#### **Company Rate Information**

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Transamerica Life Insurance Company	52.720%	52.720%	\$327,854	259	\$621,877	52.720%	52.720%

 SERFF Tracking #:
 AEGB-133092985
 State Tracking #:
 AEGB-133092985
 Company Tracking #:
 H/372

State: Pennsylvania Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

**Product Name:** HI372 - TLIC RINC 2021 - UNI2

Project Name/Number: Transam/77/77

#### Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		UNI2a Rates	ICC10 TLC-3	Revised	Previous State Filing Number: AEGB-131704842 Percent Rate Change Request: 52.72	PA Uni2a Filing Rates.pdf,

#### Transamerica Life Insurance Company

The following rate pages correspond to the <u>original</u> rates. To obtain the current rates, apply the increase factors in the table below to the base plan and its associated riders as indicated.

Policy Form*	First Increase (Approved, Implemented)
UniProduct 2a	20.0% (2019,2020)

To obtain the proposed rates, apply a 52.72% rate increase factor to the current rates of the base plan and its associated riders.

#### **Original Rates**

#### Single Standard 1 Premium Rates

per \$10 of Daily Benefit

#### Benefit Periods\*

	365 Days	730 Days	1095 Days	1460 Days	1825 Days	2190 Days	Unlimited
Facility Benefit	40.53	54.04	62.71	71.05	80.33	94.83	106.26
Home Health Care	16.54	22.06	25.60	29.00	32.79	38.71	43.37

<sup>\*</sup> Benefit Periods between years are interpolated between full year benefit periods

Example: Rate for a 1,000 day BP would be calculated as follows:

730 day rate x (1095 - 1000) / (1095 - 730) + 1095 day rate x (1000 - 730) / (1095 - 730)

54.04 x (95 / 365) + 62.71 x (270 / 365) = 60.45

Unlimited is assumed to be 3650 days for purposes of interpolating.

Single Standard Underwriting Factors			
Class	Rate		
Standard 0	0.95		
Standard 1	1.00		
Standard 2	1.05		

Preferred Underwriting Discounts		
Class	Rate	
Discount 1	10%	
Discount 2	15%	
Discount 3	20%	

Married Spouse Not Applying Discount: 15% Married Discount: 30%

Select	Select Classes			
Class I	1.25			
Class II	1.50			
Class III	1.75			
Class IV	2.00			
Class V	3.00			
Class VI	4.00			

#### **Elimination Period Factors**

		Elimination Period									
Benefit	0 Day	20 Day	30 Day	50 Day	60 Day	90 Day	100 Day	120 Day	150 Day	180 Day	365 Day
Facility	1.40	1.30	1.25	1.18	1.15	1.00	0.98	0.95	0.90	0.85	0.80
HHC	1.00	0.91	0.87	0.81	0.78	0.65	0.64	0.61	0.58	0.54	0.50

#### Age Factors

	Non-Lifetime	Lifetime
Age	Benefit Periods	Benefit Period
0	0.36	0.36
31	0.36	0.36
32	0.36	0.36
33	0.36	0.36
34	0.36	0.36
35	0.37	0.36
36	0.37	0.36
37	0.37	0.36
38	0.39	0.38
39	0.40	0.39
40	0.42	0.41
41	0.44	0.42
42	0.45	0.44
43	0.46	0.45
44	0.47	0.47
45	0.48	0.48
46	0.49	0.50
47 48	0.50 0.52	0.51
49		0.53
50	0.53	0.54 0.56
51	0.56	0.57
52	0.57	0.59
53	0.60	0.63
54	0.62	0.66
55	0.65	0.70
56	0.67	0.73
57	0.70	0.77
58	0.77	0.84
59	0.83	0.91
60	0.90	0.97
61	0.96	1.04
62	1.03	1.11
63	1.13	1.22
64	1.24	1.34
65	1.34	1.45
66	1.45	1.57
67	1.55	1.68
68	1.74	1.87
69	1.94	2.06
70	2.13	2.25
71	2.33	2.43
72	2.52 2.89	2.62
73 74	3.26	3.04 3.45
75	3.62	3.87
76	3.99	4.28
77	4.36	4.70
78	5.10	5.37
79	5.83	6.04
80	6.57	6.71
81	7.31	7.38
82	8.05	8.05
83	8.83	8.78
84	9.61	9.51
85	10.40	10.24
86	11.18	10.98
87	11.96	11.71
88	12.71	12.41
89	13.46	13.11
90	14.21	13.80
91	14.96	14.50
92	15.71	15.20
93	17.02	16.44
94	18.32	17.67
95	19.63	18.91
96	20.93	20.14
97	22.24	21.38
98	23.45	22.60
99 100	24.67 25.88	23.82 25.02
100	20.00	20.02

#### **Miscellaneous Riders**

Rider		Rate
Monthly Benefit	=	9.25% of the entire rate
Waiver of Premium - Cash Benefit Only	=	3.5% of the Home Health Care rate
Waiver of Premium - Home Care and Adult Day Care	=	1.5% of the Home Health Care rate
Nonforfeiture Benefit - Shortened Benefit Period	=	10% of the entire rate
Joint Waiver of Premium	=	2% of the entire rate

#### **Shared Care Rider**

Benefit Period		Rate
1 Year	=	32%
2 Year	=	28%
3 Year	=	17%
4 Year	=	12%
5 Year	=	9%
6 Year	=	7%
7 Year	=	6%
8 Year	=	4%
9 Year	=	3%
Lifetime	=	0%

#### **Restoration of Benefits**

#### Survivorship Rider

Benefit	
Period	Rate
1 Year	9%
2 Year	6%
3 Year	5%
4 Year	4%
5+ Year *	3%

Minimum Num	Minimum Number of Years With No Death Nor Claims									
Issue Age		0/0		10/10						
< 66		20.0%		15.0%						
>= 66		25.0%		15.0%						

<sup>\*</sup> Does not apply to Unlimited Benefit Period

Return of Premium Upon Death Rider

Issue	<u> </u>
Age	Rate
18 - 30	20%
31	20%
32 33	20% 20%
34	20%
35	21%
36	21%
37	21%
38	21% 22%
39 40	22%
41	23%
42	23%
43	24%
44 45	25% 26%
46	27%
47	28%
48	29%
49	31%
50 51	32%
51 52	34% 35%
53	37%
54	39%
55	40%
56	42%
57 58	44% 46%
59	48%
60	51%
61	53%
62	55%
63 64	58% 61%
65	64%
66	67%
67	70%
68	74%
69 70	79% 83%
70	88%
72	92%
73	98%
74	104%
75 76	109% 115%
76	121%
78	127%
79	133%
80	138%
81	144%
82 83	150% 156%
84	162%
85	168%
86	174%
87	180%
88 80	187% 194%
89 90	201%
91	208%
92	215%
93	223%
94	231% 239%
95 96	239% 247%
97	255%
98	263%
99	273%
100 +	283%

#### **Limited Pay Factors**

Issue						Paid Up
Age	1 Pay	5 Pay	10 Pay	15 Pay	20 Pay	at 65
0	33.22	7.71	3.85	3.07	2.38	1.75
31	33.22	7.71	3.85	3.07	2.38	1.75
32	33.22	7.71	3.85	3.07	2.38	1.75
33	33.22	7.71	3.82	3.02	2.36	1.77
34	33.22	7.71	3.79	2.98	2.34	1.79
35	33.22	7.71	3.76	2.93	2.32	1.80
36 37	33.22	7.71	3.73	2.89	2.31	1.82
38	33.22 32.84	7.71 7.63	3.71 3.66	2.85 2.80	2.29 2.27	1.84 1.85
39	32.46	7.55	3.61	2.76	2.25	1.87
40	32.08	7.46	3.57	2.72	2.23	1.89
41	31.70	7.38	3.52	2.67	2.21	1.90
42	31.32	7.30	3.48	2.63	2.20	1.92
43	30.95	7.17	3.41	2.58	2.17	1.97
44	30.58	7.03	3.35	2.54	2.14	2.02
45 46	30.21 29.83	6.90 6.76	3.29 3.22	2.50 2.45	2.11 2.08	2.11 2.13
47	29.46	6.63	3.16	2.43	2.05	2.16
48	28.97	6.46	3.10	2.36	2.02	2.19
49	28.49	6.29	3.05	2.30	2.00	2.22
50	28.00	6.12	2.99	2.25	1.97	2.25
51	27.51	5.95	2.94	2.19	1.95	2.34
52	27.02	5.78	2.88	2.14	1.92	2.42
53	26.37	5.65	2.82	2.09	1.88	2.51
54 55	25.72	5.52	2.75 2.69	2.04	1.84 1.80	2.60
56	25.07 24.41	5.38 5.25	2.69	2.00 1.95	1.80	2.69 3.08
57	23.76	5.11	2.56	1.90	1.70	3.48
58	23.00	4.97	2.48	1.86	1.67	3.88
59	22.25	4.82	2.41	1.82	1.62	4.28
60	21.49	4.67	2.34	1.78	1.56	4.67
61	20.74	4.53	2.27	1.73	1.51	0.00
62	19.98	4.38	2.20	1.69	1.46	0.00
63	19.14	4.22	2.13	1.62	1.41	0.00
64 65	18.30 17.45	4.07 3.91	2.07	1.55 1.48	1.36 1.30	0.00
66	16.61	3.76	1.93	1.41	1.25	0.00
67	15.77	3.60	1.86	1.34	1.20	0.00
68	15.10	3.42	1.81	1.28	1.17	0.00
69	14.42	3.23	1.75	1.22	1.13	0.00
70	13.75	3.05	1.70	1.15	1.10	0.00
71	13.07	2.86	1.64	1.09	1.07	0.00
72 73	12.40	2.68	1.59	1.02 1.02	1.04	0.00
73 74	11.71 11.02	2.53 2.37	1.53 1.47	1.02	1.03 1.03	0.00 0.00
75	10.32	2.22	1.47	1.02	1.03	0.00
76	9.63	2.07	1.36	1.01	1.02	0.00
77	8.94	1.92	1.30	1.01	1.01	0.00
78	8.70	1.81	1.26	1.01	1.01	0.00
79	8.47	1.71	1.21	1.01	1.01	0.00
80	8.23	1.61	1.16	1.01	1.01	0.00
81	8.00	1.51	1.12	1.01	1.01	0.00
82 83	7.76 7.71	1.40 1.36	1.07 1.06	1.01 1.01	1.01 1.01	0.00
84	7.67	1.32	1.05	1.01	1.01	0.00
85	7.62	1.28	1.04	1.01	1.01	0.00
86	7.58	1.24	1.03	1.01	1.01	0.00
87	7.53	1.20	1.02	1.01	1.01	0.00
88	7.51	1.18	1.02	1.01	1.01	0.00
89	7.49	1.17	1.02	1.01	1.01	0.00
90 91	7.46 7.44	1.16	1.01	1.01	1.01	0.00
91	7.44 7.42	1.14 1.13	1.01 1.01	1.01 1.01	1.01 1.01	0.00
93	7.42	1.13	1.01	1.01	1.01	0.00
94	7.38	1.12	1.01	1.01	1.01	0.00
95	7.35	1.09	1.01	1.01	1.01	0.00
96	7.33	1.08	1.01	1.01	1.01	0.00
97	7.31	1.07	1.01	1.01	1.01	0.00
98	7.29	1.05	1.01	1.01	1.01	0.00
99	7.26	1.03	1.01	1.01	1.01	0.00
100	7.24	1.01	1.01	1.01	1.01	0.00

#### Benefit Increase Option Factors for 1- Year and 2-Year Benefit Period

laa	Çimni-				T-11	Step-Rate		
Issue	Simple 5% 3%			ound	Tailored 5%	Compound 5% 3%		
Age	5%	3%	5%	3%	5%	5%	3%	
0	96%	56%	230%	97%	135%	48%	26%	
31	96%	56%	230%	97%	135%	48%	26%	
32	96%	56%	230%	97%	135%	48%	26%	
33	96%	56%	229%	97%	134%	48%	26%	
34	96%	56%	228%	97%	134%	48%	26%	
35	96%	56%	227%	97%	134%	48%	26%	
36	96%	56%	226%	97%	134%	48%	26%	
37	96%	56%	225%	97%	134%	48%	26%	
38	96%	56%	225%	97%	134%	48%	26%	
39	96%	56%	225%	97%	133%	48%	26%	
40	96%	56%	225%	97%	133%	48%	26%	
41	96%	56%	225%	97%	133%	48%	26%	
42	96%	56%	224%	97%	133%	48%	26%	
43	96%	56%	224%	97%	129%	48%	26%	
44	96%	56%	224%	97%	125%	48%	26%	
45	96%	56%	224%	97%	121%	48%	26%	
46	96%	56%	224%	97%	118%	48%	26%	
47	96%	56%	223%	97%	114%	48%	26%	
48	96%	56%	220%	97%	110%	47%	26%	
49	96%	56%	216%	97%	106%	47%	26%	
50	96%	56%	213%	97%	102%	46%	26%	
51	96%	56%	209%	97%	99%	46%	26%	
52	96%	56%	206%	97%	95%	45%	26%	
53	95%	55%	199%	94%	90%	44%	26%	
54	95%	55%	192%	92%	85%	43%	25%	
55	94%	55%	186%	89%	81%	42%	25%	
56	93%	54%	179%	87%	76%	41%	25%	
57	92%	54%	173%	84%	71%	40%	25%	
58	90%	53%	167%	82%	66%	38%	23%	
59	88%	52%	160%	79%	62%	36%	21%	
60	86%	51%	154%	76%	57%	34%	20%	
61	84%	50%	148%	74%	52%	32%	18%	
62	82%	49%	142%	71%	47%	30%	16%	
63	78%	49%	134%	67%	43%	27%	14%	
64	74%	46%	127%	63%	38%	24%	13%	
65	70%	45%	119%	59%	33%	22%	11%	
66	66%	43%	111%	55%	28%	19%	10%	
67	62%	42%	103%	51%	24%	16%	8%	
68	58%	40%	96%	49%	20%	15%	8%	
69	53%	38%	89%	46%	17%	14%	7%	
70	48%	37%	81%	43%	14%	13%	7%	
71	43%	35%	74%	40%	11%	12%	6%	
72	39%	33%	67%	37%	8%	11%	6%	
73	37%	31%	63%	35%	6%	10%	5%	
74	35%	30%	59%	33%	5%	9%	5%	
75	33%	28%	56%	31%	3%	8%	4%	
76	31%	27%	52%	29%	2%	7%	4%	
77	29%	25%	48%	27%	0%	6%	3%	
78	28%	24%	45%	25%	0%	5%	3%	
79	26%	23%	42%	24%	0%	5%	3%	
80	25%	21%	39%	22%	0%	5%	3%	
81	23%	20%	36%	21%	0%	5%	3%	
82	22%	19%	33%	19%	0%	4%	2%	
83	21%	18%	31%	18%	0%	4%	2%	
84	20%	18%	31%	17%	0%	3%	2%	
85	19%	17%	29%	16%	0%	3%	1%	
86	18%	15%	27%	16%	0%	2%	1%	
87	17%	15%	26%	15%	0%	1%	1%	
88	17%	14%	25%	14%	0%	1%	1%	
89	16%	13%	24%	13%	0%	1%	1%	
90	15%	13%	22%	13%	0%	1%	1%	
91	15%	12%	21%	12%	0%	1%	1%	
92	14%	12%	20%	12%	0%	1%	0%	
93	13%	11%	19%	11%	0%	1%	0%	
93 94	13%	11%	18%	11%	0%	1%	0%	
95	12%	11%	18%	10%	0%	1%	0%	
95 96	12%	10%	17%	10%	0%	1%	0%	
				9%				
97	12% 11%	10%	16%	9% 9%	0%	1% 1%	0%	
	1 1 1 7/0	9%	15%	9%	0%	1%	0%	
98 99	11%	9%	15%	8%	0%	1%	0%	

#### Benefit Increase Option Factors for 3-Year Benefit Period

Issue	ei~	nple	Com-	oound	Tailored		-Rate oound
		•					
Age	5%	3%	5%	3%	5%	5%	3%
0	99%	57%	248%	97%	135%	47%	25%
31	99%	57%	248%	97%	135%	47%	25%
32	99%	57%	248%	97%	135%	47%	25%
33	99%	57% 57%	248%	97%	134%	47%	25% 25%
34	99%	57% 57%	248%	97%	134%	47%	25%
35							
	99%	57%	248%	97%	134%	47%	25%
36	99%	57%	248%	97%	134%	47%	25%
37	99%	57%	248%	97%	134%	47%	25%
38	99%	57%	248%	97%	134%	47%	25%
39	99%	57%	248%	97%	133%	47%	25%
40	99%	57%	248%	97%	133%	47%	25%
41	99%	57%	248%	97%	133%	47%	25%
42	99%	57%	248%	97%	133%	47%	25%
43	99%	56%	245%	97%	129%	47%	25%
44	99%	56%	242%	97%	125%	47%	25%
45	99%	56%	240%	97%	121%	47%	25%
46	99%	56%	237%	97%	118%	46%	25%
47	99%	56%	234%	97%	114%	46%	25%
48	99%	56%	231%	97%	110%	46%	25%
49	99%	56%	227%	97%	106%	46%	25%
50	99%	56%	223%	97%	102%	46%	25%
51	99%	56%	219%	97%	99%	45%	25%
52	99%	56%	216%	97%	95%	45%	25%
53	98%	55%	209%	95%	90%	44%	25%
54	98%	55%	202%	92%	85%	43%	25%
55	97%	55%	195%	90%	81%	42%	25%
56	96%	54%	188%	88%	76%	41%	25%
57	95%	54%	181%	86%	71%	40%	25%
58	93%	53%	175%	83%	66%	38%	25%
59	91%	52%	169%	80%	62%	35%	25%
60	89%	51%	162%	77%	57%	33%	24%
61	87%	50%	156%	75%	52%	31%	24%
62	85%	49%	149%	72%	47%	28%	24%
63	81%	47%	141%	68%	43%	26%	21%
64	78%	46%	133%	64%	38%	24%	18%
65	74%	45%	125%	61%	33%	21%	15%
66	70%	43%	117%	57%	28%	19%	12%
67	66%	42%	109%	53%	24%	16%	10%
68	61%	42%	109%	50%	24%	15%	9%
69	57%	38%	93%	47%	17%	14%	8%
70		37%		43%	14%	13%	7%
70 71	52%		86%			12%	
	47%	35%	78%	40%	11%		6%
72	43%	33%	71%	37%	8%	11%	6%
73	40%	31%	67%	35%	6%	10%	5%
74	38%	30%	63%	33%	5%	9%	5%
75	35%	28%	59%	31%	3%	8%	4%
76	33%	27%	55%	29%	2%	7%	4%
77	31%	25%	51%	27%	0%	6%	3%
78	29%	24%	48%	25%	0%	5%	3%
79	28%	23%	45%	24%	0%	5%	3%
80	26%	21%	42%	22%	0%	5%	3%
81	24%	20%	38%	21%	0%	5%	2%
82	23%	19%	35%	19%	0%	4%	2%
83	22%	18%	33%	18%	0%	4%	2%
84	21%	18%	32%	17%	0%	3%	2%
85	20%	17%	30%	16%	0%	3%	1%
86	19%	15%	28%	16%	0%	2%	1%
87	18%	15%	27%	15%	0%	1%	1%
88	18%	14%	26%	14%	0%	1%	1%
89	17%	13%	25%	13%	0%	1%	1%
90	16%	13%	23%	13%	0%	1%	1%
91	15%	12%	22%	12%	0%	1%	0%
92	15%	12%	21%	12%	0%	1%	0%
93	14%	11%	20%	11%	0%	1%	0%
94	14%	11%	19%	11%	0%	1%	0%
95	13%	11%	19%	10%	0%	1%	0%
96	12%	10%	18%	10%	0%	1%	0%
97	12%	10%	17%	9%	0%	1%	0%
97 98		9%		9% 9%		1%	0%
	11%	3 70	16%		0%		
99	11%	9%	16%	8%	0%	1%	0%

#### Benefit Increase Option Factors for 4-Year Benefit Period

Issue	Qin	nple	Come	oound	Tailored		-Rate oound	
Age	5%	3%	5%	3%	5%	5% 3%		
Age	3%	376	370	3%	376	3%	370	
0	108%	65%	271%	110%	152%	53%	28%	
31	108%	65%	271%	110%	152%	53%	28%	
32	108%	65%	271%	110%	152%	53%	28% 28%	
33	108%	65%	269%	110%	152%	53%	28%	
34		65%	268%	110%		53%	28%	
35	108%				151%			
	108%	65%	267%	110%	151%	53%	28%	
36	108%	65%	266%	110%	151%	53%	28%	
37	108%	65%	265%	110%	151%	53%	28%	
38	108%	65%	264%	110%	151%	53%	28%	
39	108%	65%	263%	110%	150%	53%	28%	
40	108%	65%	261%	110%	150%	53%	28%	
41	108%	65%	260%	110%	150%	53%	28%	
42	108%	65%	259%	110%	150%	53%	28%	
43	108%	65%	259%	110%	145%	53%	28%	
44	108%	65%	259%	110%	139%	53%	28%	
45	108%	65%	259%	110%	134%	53%	28%	
46	108%	65%	258%	110%	129%	53%	28%	
47	108%	65%	258%	110%	123%	53%	28%	
48	108%	65%	254%	110%	119%	53%	28%	
49	108%	65%	250%	110%	116%	53%	28%	
50	108%	65%	246%	110%	112%	53%	28%	
51	108%	65%	242%	110%	108%	53%	28%	
52	108%	65%	238%	110%	104%	52%	28%	
53	107%	65%	231%	108%	100%	51%	28%	
54	105%	64%	224%	105%	95%	49%	28%	
55	104%	64%	217%	102%	90%	48%	28%	
56	103%	63%	210%	99%	85%	46%	28%	
57	102%	63%	203%	97%	81%	44%	28%	
58	99%	61%	193%	93%	74%	42%	27%	
59	97%	60%	184%	89%	68%	40%	26%	
60	95%	58%	175%	85%	62%	37%	26%	
61	93%	56%	166%	82%	55%	35%	25%	
62	91%	55%	157%	78%	49%	32%	24%	
63	86%	53%	148%	74%	44%	29%	21%	
64	81%	51%	139%	70%	39%	26%	18%	
65	77%	49%	130%	66%	34%	23%	15%	
66	72%	47%	121%	61%	29%	19%	11%	
67	67%	46%	112%	57%	24%	16%	8%	
68	63%	44%	105%	54%	21%	15%	8%	
69	58%	42%	99%	51%	18%	14%	7%	
70	54%	40%	92%	48%	15%	13%	7%	
71	49%	38%	85%	46%	12%	12%	6%	
72	45%	36%	79%	43%	9%	11%	6%	
73	42%	34%	74%	40%	7%	10%	5%	
73 74	39%	33%	74%	37%	7 % 5%	9%	5% 5%	
75		33%		35%	5% 4%	8%	5% 4%	
75 76	36% 32%	31% 29%	65% 61%			8% 7%	4% 4%	
	32%	29%	61%	32%	2%			
77 79	29%	_	56%	30%	0%	6%	3% 3%	
78 70	28%	26%	53%	28%	0%	5% 5%		
79	26%	25%	50%	26%	0%	5%	3%	
80	25%	23%	46%	24%	0%	5%	3%	
81	23%	22%	43%	23%	0%	5%	2%	
82	22%	20%	39%	21%	0%	4%	2%	
83	21%	19%	37%	20%	0%	4%	2%	
84	20%	19%	36%	19%	0%	3%	2%	
85	19%	18%	33%	18%	0%	3%	1%	
86	19%	17%	31%	18%	0%	2%	1%	
87	17%	17%	30%	17%	0%	1%	1%	
88	17%	16%	29%	15%	0%	1%	1%	
89	16%	14%	28%	14%	0%	1%	1%	
90	15%	14%	25%	14%	0%	1%	1%	
91	15%	13%	24%	13%	0%	1%	0%	
92	14%	13%	23%	13%	0%	1%	0%	
93	13%	12%	22%	12%	0%	1%	0%	
94	13%	12%	21%	12%	0%	1%	0%	
95	12%	12%	21%	11%	0%	1%	0%	
96	12%	11%	20%	11%	0%	1%	0%	
97	12%	11%	18%	10%	0%	1%	0%	
98	11%	10%	17%	10%	0%	1%	0%	
99	11%	10%	17%	9%	0%	1%	0%	
			16%	9%	0%	1%	0%	

#### Benefit Increase Option Factors for 5-Year Benefit Period

Issue	Qin	ple	Come	oound	Tailored		-Rate oound	
Age	5%	3%	5%	3%	5%	5% 3%		
Age	3%	376	370	370	370	3%	370	
0	108%	65%	271%	100%	139%	50%	28%	
31	108%	65%	271%	100%	139%	50%	28%	
32	108%	65%	271%	100%	139%	50%	28%	
33	108%	65%	269%	100%	139%	50%	28%	
34		65%		100%		50%		
35	108%		268%		139%		28%	
	108%	65%	267%	100%	139%	50%	28%	
36	108%	65%	266%	100%	139%	50%	28%	
37	108%	65%	265%	100%	138%	50%	28%	
38	108%	65%	264%	100%	138%	50%	28%	
39	108%	65%	263%	100%	138%	50%	28%	
40	108%	65%	261%	100%	138%	50%	28%	
41	108%	65%	260%	100%	138%	50%	28%	
42	108%	65%	259%	100%	138%	50%	28%	
43	108%	65%	259%	100%	132%	50%	28%	
44	108%	65%	259%	100%	127%	50%	28%	
45	108%	65%	259%	100%	122%	50%	28%	
46	108%	65%	258%	100%	117%	50%	28%	
47	108%	65%	258%	100%	112%	50%	28%	
48	108%	65%	254%	100%	108%	49%	28%	
49	108%	65%	250%	100%	105%	49%	28%	
50	108%	65%	246%	100%	101%	49%	28%	
51	108%	65%	242%	100%	97%	48%	28%	
52	108%	65%	238%	100%	94%	48%	28%	
53	107%	65%	231%	97%	89%	47%	28%	
54	105%	64%	224%	95%	85%	46%	28%	
55	104%	64%	217%	92%	81%	45%	28%	
56	103%	63%	210%	89%	76%	44%	28%	
57	102%	63%	203%	87%	72%	43%	28%	
58	99%	61%	193%	83%	66%	41%	27%	
59	97%	60%	184%	80%	60%	39%	26%	
60	95%	58%	175%	76%	54%	37%	26%	
61	93%	56%	166%	73%	48%	34%	25%	
62	91%	55%	157%	69%	42%	32%	24%	
63	86%	53%	148%	65%	37%	29%	21%	
64	81%	51%	139%	61%	32%	26%	18%	
65	77%	49%	130%	57%	27%	23%	15%	
66	72%	47%	121%	53%	23%	20%	11%	
67	67%	46%	112%	49%	18%	17%	8%	
68	63%	44%	105%	47%	15%	16%	8%	
69	58%	42%	99%	44%	12%	15%	7%	
70	54%	40%	92%	41%	9%	13%	7%	
70 71	49%	38%	92% 85%		9% 6%	12%	6%	
				38%				
72 72	45%	36%	79%	35%	4%	11%	6%	
73 74	42%	34%	74%	33%	3%	10%	5%	
74	39%	33%	70%	31%	2%	9%	5%	
75 76	36%	31%	65%	28%	1%	8%	4%	
76	32%	29%	61%	26%	1%	7%	4%	
77 70	29%	28%	56%	23%	0%	6%	3%	
78 70	28%	26%	53%	22%	0%	5%	3%	
79	26%	25%	50%	20%	0%	5%	3%	
80	25%	23%	46%	19%	0%	5%	3%	
81	23%	22%	43%	18%	0%	5%	2%	
82	22%	20%	39%	16%	0%	4%	2%	
83	21%	19%	37%	15%	0%	4%	2%	
84	20%	19%	36%	15%	0%	3%	2%	
85	19%	18%	33%	14%	0%	3%	1%	
86	19%	17%	31%	14%	0%	2%	1%	
87	17%	17%	30%	13%	0%	1%	1%	
88	17%	16%	29%	12%	0%	1%	1%	
89	16%	14%	28%	11%	0%	1%	1%	
90	15%	14%	25%	11%	0%	1%	1%	
91	15%	13%	24%	10%	0%	1%	0%	
92	14%	13%	23%	10%	0%	1%	0%	
93	13%	12%	22%	9%	0%	1%	0%	
94	13%	12%	21%	9%	0%	1%	0%	
95	12%	12%	21%	9%	0%	1%	0%	
96	12%	11%	20%	9%	0%	1%	0%	
97	12%	11%	18%	8%	0%	1%	0%	
98	11%	10%	17%	8%	0%	1%	0%	
99	11%	10%	17%	7%	0%	1%	0%	
							, ,,,	

Benefit Increase Option Factors for Unlimited Benefit Periods \*

Issue	Qin	nple	Comr	oound	Tailored		-Rate oound
	5%	3%	5%	3%	5%	5%	3%
Age	3 /0	3 /0	3 /0	3 /0	3 /0	3 /0	3 /0
0	186%	100%	444%	201%	199%	92%	55%
31	186%	100%	444%	201%	199%	92%	55%
32	186%	100%	444%	201%	199%	92%	55%
33	186%	100%	444%	201%	199%	92%	55%
34	186%	100%	443%	201%	198%	92%	55%
35	186%	100%	443%	200%	198%	92%	55%
36	186%	100%	442%	200%		92%	55%
37			442%		197%	92%	
	186%	100%		199%	197%		55%
38	185%	100%	440%	198%	197%	92%	55%
39	184%	100%	438%	197%	196%	92%	55%
40	183%	100%	436%	196%	196%	92%	55%
41	182%	100%	434%	195%	195%	92%	55%
42	181%	100%	432%	194%	195%	92%	55%
43	179%	99%	424%	191%	187%	91%	55%
44	178%	99%	416%	188%	179%	90%	55%
45	176%	99%	408%	185%	171%	89%	54%
46	174%	98%	400%	182%	163%	88%	54%
47	172%	98%	392%	179%	155%	87%	54%
48	171%	96%	381%	176%	148%	85%	53%
49	169%	94%	371%	173%	141%	84%	52%
50	168%	91%	360%	170%	134%	82%	51%
51	166%	89%	350%	167%	127%	81%	51%
52	164%	87%	339%	164%	120%	79%	50%
53	162%	85%	326%	160%	114%	76%	49%
54	159%	84%	312%	156%	108%	73%	47%
55	157%	83%	298%	152%	102%	70%	46%
56	154%	81%	285%	148%	96%	67%	45%
57	151%	80%	271%	144%	90%	64%	43%
58	147%	78%	260%	139%	84%	61%	41%
59	142%	77%	250%	134%	78%	57%	40%
60	138%	75%	239%	128%	72%	54%	38%
61	133%	73%	229%	123%	66%	50%	36%
62	128%	72%	218%	118%	60%	47%	34%
63	124%	70%	209%	113%	54%	43%	32%
64	120%	68%	200%	109%	48%	38%	29%
65	117%	66%	190%	104%	42%	34%	27%
66	113%	64%	181%	100%	36%	30%	25%
67	109%	63%	172%	95%	30%	25%	23%
68	104%	60%	163%	91%	26%	24%	21%
69	100%	58%	155%	87%	22%	22%	20%
70	96%	56%	146%	83%	17%	21%	19%
71	92%	54%	138%	79%	13%	20%	17%
72	88%	51%	129%	75%	9%		16%
						18%	
73 74	84%	49%	123%	72%	7%	17%	15%
74	80%	47%	117%	69%	5%	16%	15%
75 76	77%	45%	111%	66%	4%	15%	14% 14%
76 77	73%	43%	105%	63%	2%	14%	
77 70	69%	41%	99%	60%	0%	13%	13%
78 70	66%	39%	93%	57%	0%	12%	13%
79	62%	37%	87%	53%	0%	12%	12%
80	58%	35%	81%	50%	0%	11%	11%
81	55%	33%	74%	46%	0%	10%	11%
82	51%	31%	68%	42%	0%	10%	10%
83	49%	29%	64%	40%	0%	8%	9%
84	47%	29%	62%	38%	0%	7%	7%
85	46%	27%	58%	36%	0%	6%	6%
86	44%	25%	54%	36%	0%	5%	5%
87	40%	25%	52%	33%	0%	3%	3%
88	40%	23%	50%	31%	0%	3%	3%
89	38%	22%	48%	29%	0%	3%	3%
90	36%	22%	44%	29%	0%	2%	2%
91	35%	20%	42%	27%	0%	2%	2%
92	33%	20%	40%	27%	0%	2%	2%
93	31%	18%	38%	25%	0%	2%	2%
94	31%	18%	36%	25%	0%	2%	2%
95	29%	18%	36%	22%	0%	2%	2%
96	27%	16%	34%	22%	0%	2%	2%
97	27%	16%	32%	20%	0%	2%	2%
98	26%	14%	30%	20%	0%	2%	2%
99	26%	14%	30%	18%	0%	2%	2%
	20/0	1 7 /0	JU /0	10 /0	U /0	∠ /0	2/0

<sup>\*</sup> Benefit Periods between years are interpolated between full year benefit periods.
Unlimited is assumed to be 3650 days for purposes of interpolating.
This is consistent with the way Benefit Periods are interpolated on the Base Rates.
Inflation factors for Benefit periods between 5 years and Unlimited will be interpolated between the 5 year and these Unlimited Benefit Period factors.

Full Benefit Increase Option Factors for 1-Year and 2-Year Benefit Period

loores	Cimala		C	יסווסל	Toilered	Step-Rate Compound		
Issue	Simple			ound	Tailored			
Age	5%	3%	5%	3%	5%	5%	3%	
	4440/	200/	0000/	4000/	4700/	7.40/	000/	
0	111%	68%	288%	132%	176%	74%	36%	
31	111%	68%	288%	132%	176%	74%	36%	
32	111%	68%	288%	132%	176%	74%	36%	
33	111%	68%	287%	132%	176%	74%	36%	
34	111%	68%	286%	132%	176%	74%	36%	
35	111%	68%	284%	132%	176%	74%	36%	
36	111%	68%	283%	132%	175%	74%	36%	
37	111%	68%	282%	132%	175%	74%	36%	
38	111%	68%	282%	132%	175%	74%	36%	
39	111%	68%	282%	132%	175%	74%	36%	
40	111%	68%	282%	132%	174%	74%	36%	
41	111%	68%	282%	132%	174%	74%	36%	
42	111%	68%	282%	132%	174%	74%	36%	
43	111%	68%	277%	130%	167%	72%	36%	
44	111%	68%	273%	127%	160%	70%	36%	
45	111%	68%	269%	125%	152%	68%	36%	
46	111%	68%	264%	122%	145%	66%	35%	
47	111%	68%	260%	120%	138%	65%	35%	
48	111%	68%	255%	119%	133%	64%	35%	
49	111%	68%	250%	118%	128%	63%	35%	
50	111%	68%	246%	118%	124%	62%	35%	
51	111%	68%	241%	117%	119%	61%	35%	
52	111%	68%	236%	116%	114%	60%	35%	
53	111%	68%	229%	114%	109%	59%	35%	
54	110%	67%	222%	111%	104%	58%	35%	
55	109%	67%	214%	108%	99%	56%	35%	
56	108%	66%	207%	105%	93%	55%	35%	
57	107%	66%	200%	103%	88%	54%	35%	
58	105%	65%	192%	99%	82%	52%	33%	
59	103%	64%	185%	96%	77%	50%	31%	
60	101%	62%	178%	92%	71%	47%	30%	
61	99%	61%	170%	89%	66%	45%	28%	
62	97%	60%	163%	86%	60%	43%	26%	
63	91%	57%	153%	80%	54%	39%	23%	
64	84%	54%	143%	75%	48%	34%	20%	
65	78%	51%	133%	69%	41%	30%	17%	
66	72%	48%	123%	64%	35%	26%	14%	
		45%					11%	
67	66%		112%	58%	29%	22%		
68	61%	43%	105%	55%	26%	20%	10%	
69	57%	42%	97%	52%	23%	19%	10%	
70	52%	40%	89%	49%	19%	18%	9%	
71	47%	38%	82%	46%	16%	17%	9%	
72	42%	36%	74%	43%	13%	16%	8%	
73	40%	35%	70%	41%	10%	15%	8%	
74	38%	33%	67%	39%	8%	14%	7%	
75	36%	31%	63%	37%	5%	12%	7%	
76	34%	30%	59%	35%	3%	11%	6%	
77	32%	28%	55%	33%	0%	10%	6%	
78	31%	27%	52%	31%	0%	10%	5%	
79	29%	25%	48%	29%	0%	9%	5%	
80	27%	24%	45%	27%	0%	9%	5%	
81	26%	22%	41%	25%	0%	8%	5%	
82	24%	21%	38%	23%	0%	8%	4%	
83	23%	20%	36%	22%	0%	7%	4%	
84	22%	20%	35%	21%	0%	6%	3%	
85	21%	18%	32%	19%	0%	5%	3%	
86	20%	17%	30%	19%	0%	4%	2%	
87	19%	17%	29%	18%	0%	3%	1%	
88	19%	16%	28%	17%	0%	2%	1%	
89	18%	15%	27%	16%	0%	2%	1%	
90	17%	15%	25%	16%	0%	2%	1%	
91	16%	14%	24%	15%	0%	2%	1%	
92	15%	14%	22%	15%	0%	1%	1%	
93	14%	12%	21%	13%	0%	1%	1%	
94	14%	12%	20%	13%	0%	1%	1%	
95	14%	12%	20%	12%	0%	1%	1%	
96	13%	11%	19%	12%	0%	1%	1%	
97	13%	11%	18%	11%	0%	1%	1%	
				11%	0%	1%	1%	
	120/2							
98 99	12% 12%	10% 10%	17% 17%	10%	0%	1%	1%	

#### Full Benefit Increase Option Factors for 3-Year Benefit Period

loove	Simple		C	ound.	Tailored	Step-Rate Compound		
Issue	5% 3%			Compound 5% 3%		5% 3%		
Age	5%	3%	5%	3%	5%	5%	3%	
0	108%	64%	291%	122%	163%	65%	30%	
31	108%	64%	291%	122%	163%	65%	30%	
32	108%	64%	291%	122%	163%	65%	30%	
33	108%	64%	291%	121%	163%	65%	30%	
34	108%	64%	291%	121%	163%	65%	30%	
35	108%	64%	290%	121%	163%	65%	30%	
36	108%	64%	290%	121%	162%	65%	30%	
37	108%	64%	290%	121%	162%	65%	30%	
38	108%	64%	290%	121%	162%	65%	30%	
39	108%	64%	290%	121%	162%	65%	30%	
40	108%	64%	290%	121%	162%	65%	30%	
41	108%	64%	290%	121%	161%	65%	30%	
42	108%	64%	290%	121%	161%	65%	30%	
43	108%	64%	284%	119%	155%	63%	30%	
44	108%	64%	277%	117%	148%	62%	31%	
45	108%	63%	271%	115%	142%	60%	31%	
46	108%	63%	265%	113%	136%	59%	31%	
47	108%	63%	258%	111%	129%	57%	31%	
48	108%	63%	253%	111%	124%	56%	31%	
49	108%	63%	248%	110%	119%	55%	31%	
50	108%	63%	242%	109%	115%	54%	31%	
51	108%	63%	237%	108%	110%	53%	31%	
52	108%	63%	232%	107%	105%	52%	31%	
53	108%	63%	225%	104%	100%	51%	31%	
54	107%	62%	217%	102%	95%	50%	31%	
55	106%	62%	210%	100%	90%	49%	31%	
56	105%	61%	203%	97%	85%	48%	31%	
57	104%	61%	196%	95%	80%	47%	31%	
58	102%	60%	189%	92%	75%	45%	31%	
59	100%	59%	182%	89%	70%	42%	30%	
60	98%	58%	175%	86%	65%	40%	30%	
61	96%	57%	169%	84%	60%	37%	30%	
62	94%	56%	162%	81%	55%	35%	30%	
63	89%	53%	153%	76%	49%	32%	26%	
64	84%	51%	143%	72%	44%	29%	23%	
65	80%	49%	134%	67%	39%	26%	19%	
66	75%	47%	125%	63%	33%	23%	16%	
67	70%	45%	116%	58%	28%	20%	12%	
68	65%	43%	108%	55%	25%	19%	11%	
69	60%	42%	100%	52%	21%	18%	11%	
70	56%	40%	92%	48%	18%	17%	10%	
71	51%	38%	84%	45%	15%	16%	9%	
72	46%	36%	76%	42%	12%	14%	8%	
73	44%	35%	72%	40%	9%	13%	8%	
74	41%	33%	68%	38%	7%	12%	7%	
75	39%	31%	64%	36%	5%	11%	7%	
76	36%	30%	60%	33%	2%	10%	6%	
77	34%	28%	56%	31%	0%	9%	5%	
78	32%	27%	53%	30%	0%	9%	5%	
79	30%	25%	49%	28%	0%	8%	5%	
80	29%	24%	46%	26%	0%	8%	5%	
81	27%	22%	42%	24%	0%	7%	4%	
82	25%	21%	39%	22%	0%	7%	4%	
83	24%	20%	37%	21%	0%	6%	4%	
84	23%	20%	36%	20%	0%	5%	3%	
85 86	22%	18%	33%	19%	0%	4% 2%	3%	
86 97	21%	17%	31%	19%	0%	3%	2%	
87 99	20%	17%	30%	17%	0%	2%	1%	
88 80	20%	16% 15%	29%	16% 15%	0%	2%	1%	
89	19%	15%	27%	15%	0%	2%	1%	
90 01	18%	15%	25%	15% 14%	0%	2% 1%	1%	
91	17%	14%	24%	14%	0%	1%	1%	
92	16%	14%	23%	14%	0%	1%	1%	
93 94	15% 15%	12%	22%	13%	0%	1% 1%	1%	
	15%	12%	21%	13%	0%	1%	1%	
95 96	14%	12%	21%	12%	0%	1% 1%	1%	
96 07	13%	11%	19%	12%	0%	1%	1%	
97	13%	11%	18%	10%	0%	1%	1%	
98	13%	10% 10%	17% 17%	10% 9%	0% 0%	1% 1%	1% 1%	
99	13%							

#### Full Benefit Increase Option Factors for 4-Year Benefit Period

lac:	Simple		_	1	Tailored	Step-Rate Compound		
Issue	Simple 5% 3%			Compound		5% 3%		
Age	5%	3%	5%	3%	5%	5%	3%	
0	117%	72%	328%	143%	191%	77%	34%	
31	117%	72%	328%	143%	191%	77%	34%	
32	117%	72%	328%	143%	191%	77%	34%	
33	117%	72%	327%	143%	191%	77%	34%	
34	117%	72%	325%	143%	190%	77%	34%	
35	117%	72%	324%	143%	190%	77%	34%	
36	117%	72%	323%	143%	190%	77%	34%	
37	117%	72%	321%	143%	190%	77%	34%	
38	117%	72%	320%	143%	189%	77%	34%	
39	117%	72%	319%	143%	189%	77%	34%	
40	117%	72%	317%	143%	189%	77%	34%	
41	117%	72%	316%	143%	189%	77%	34%	
42 43	117%	72% 72%	315%	143% 140%	189% 180%	77% 75%	34% 34%	
43 44	117% 117%	72%	310% 306%	138%	171%	73%	34%	
45	117%	73%	301%	135%	162%	71%	34%	
46	118%	73%	296%	132%	153%	69%	34%	
47	118%	73%	292%	130%	144%	67%	34%	
48	118%	73%	286%	129%	139%	66%	34%	
49	118%	73%	280%	128%	134%	66%	34%	
50	118%	73%	274%	127%	129%	65%	34%	
51	118%	73%	268%	126%	124%	64%	34%	
52	117%	73%	262%	125%	119%	64%	34%	
53	116%	73%	255%	123%	114%	62%	34%	
54	115%	72%	247%	120%	109%	60%	34%	
55	114%	71%	240%	117%	104%	58%	34%	
56	112%	71%	232%	114%	99%	57%	34%	
57	111%	70%	225%	111%	94%	55%	34%	
58	109%	69%	215%	107%	87%	52%	33%	
59	106%	67%	205%	103%	80%	50%	32%	
60	104%	65%	196%	99%	74%	47%	31%	
61	102%	63%	186%	95%	67%	45%	31%	
62 63	100%	62%	176%	92% 86%	61%	42% 38%	30%	
64	94% 88%	59% 57%	165% 154%	81%	54% 48%	36% 34%	26% 22%	
65	83%	54%	143%	75%	42%	30%	18%	
66	77%	52%	132%	70%	35%	26%	15%	
67	71%	49%	122%	64%	29%	22%	11%	
68	67%	47%	115%	61%	26%	20%	10%	
69	62%	45%	108%	58%	23%	19%	10%	
70	58%	43%	101%	55%	20%	18%	9%	
71	53%	41%	94%	52%	17%	17%	9%	
72	48%	39%	87%	49%	14%	16%	8%	
73	45%	38%	82%	46%	11%	15%	8%	
74	42%	36%	77%	44%	8%	14%	7%	
75	39%	34%	73%	41%	6%	12%	7%	
76	36%	32%	68%	38%	3%	11%	6%	
77	32%	31%	63%	36%	0%	10%	5%	
78 70	31%	29%	60%	33%	0%	10%	5%	
79	29%	27%	56%	31%	0%	9%	5%	
80 Ω1	27%	26%	52%	29%	0%	9%	5%	
81 82	26%	24%	48%	27% 25%	0%	8% 8%	4%	
82 83	24% 23%	23% 21%	44% 41%	25% 24%	0% 0%	8% 7%	4% 4%	
84	23%	21%	40%	24%	0%	6%	3%	
85	21%	20%	38%	21%	0%	5%	3%	
86	20%	19%	35%	21%	0%	4%	2%	
87	19%	19%	34%	20%	0%	3%	1%	
88	19%	17%	32%	18%	0%	2%	1%	
89	18%	16%	31%	17%	0%	2%	1%	
90	17%	16%	29%	17%	0%	2%	1%	
91	16%	15%	27%	16%	0%	2%	1%	
92	15%	15%	26%	16%	0%	1%	1%	
93	14%	13%	25%	14%	0%	1%	1%	
94	14%	13%	23%	14%	0%	1%	1%	
95	14%	13%	23%	13%	0%	1%	1%	
96	13%	12%	22%	13%	0%	1%	1%	
97	13%	12%	21%	12%	0%	1%	1%	
98	12%	11%	19%	12%	0%	1%	1%	
99	12%	11%	19%	11%	0%	1%	1%	
100	11%	11%	18%	11%	0%	1%	1%	

#### Full Benefit Increase Option Factors for 5-Year Benefit Period

Issue	Sim	nle	Com	oound	Tailored	Step-Rate Compound		
	5%	3%	5%	3%	5%	5% 3%		
Age	5%	3%	5%	3%	570	<b>5</b> %	3%	
0	113%	69%	320%	127%	171%	70%	31%	
31	113%	69%	320%	127%	171%	70%	31%	
32	113%	69%	320%	127%	171%	70%	31%	
32 33	113%	69%	320%	127%	171%	70% 70%	31%	
34	113%	69%	319%	126%	171%	70% 70%	31%	
35								
35 36	113%	69%	316%	126%	171%	70%	31%	
	113%	69%	315%	126%	170%	70%	31%	
37	113%	69%	313%	126%	170%	70%	31%	
38	113%	69%	312%	126%	170%	70%	31%	
39	113%	69%	311%	126%	170%	70%	31%	
40	113%	69%	309%	126%	170%	70%	31%	
41	113%	69%	308%	126%	169%	70%	31%	
42	113%	69%	307%	126%	169%	70%	31%	
43	113%	69%	303%	124%	161%	68%	31%	
44	113%	69%	298%	122%	153%	67%	31%	
45	113%	69%	294%	119%	144%	65%	31%	
46	113%	69%	290%	117%	136%	63%	31%	
47	113%	69%	286%	115%	128%	61%	31%	
48	113%	69%	279%	114%	123%	60%	31%	
49	113%	69%	273%	112%	118%	59%	31%	
50	113%	69%	266%	111%	113%	57%	31%	
51	113%	69%	259%	110%	108%	56%	31%	
52	113%	69%	253%	109%	103%	55%	31%	
53	112%	69%	246%	106%	98%	54%	31%	
54	110%	68%	238%	103%	93%	53%	31%	
55	109%	68%	231%	101%	89%	52%	31%	
56	108%	67%	224%	98%	84%	51%	31%	
57	106%	67%	216%	95%	80%	50%	31%	
58	104%	65%	207%	91%	73%	47%	30%	
59	102%	63%	197%	88%	67%	45%	30%	
60	100%	62%	187%	84%	61%	43%	29%	
61	98%	60%	178%	80%	54%	40%	28%	
62	95%	58%	168%	77%	48%	38%	27%	
63	90%	56%	159%	73%	43%	35%	23%	
64	84%	53%	150%	69%	38%	32%	20%	
65	79%	51%	140%	64%	33%	29%	16%	
66	73%	48%	131%	60%	28%	26%	12%	
67	67%	46%	122%	56%	23%	23%	8%	
68	63%	44%	115%	53%	20%	21%	8%	
69	58%	42%	108%	50%	17%	20%	7%	
70	54%	40%	101%	47%	14%	18%	7%	
71	49%	38%	94%	44%	11%	17%	6%	
72	45%	36%	87%	42%	8%	16%	6%	
73	42%	34%	82%	39%	7%	15%	5%	
74	39%	33%	77%	36%	5%	14%	5%	
75	36%	31%	73%	34%	3%	12%	4%	
76	32%	29%	68%	31%	2%	11%	4%	
77	29%	28%	63%	29%	0%	10%	3%	
78	28%	26%	60%	27%	0%	10%	3%	
79	26%	25%	56%	25%	0%	9%	3%	
80	25%	23%	52%	24%	0%	9%	3%	
81	23%	23% 22%	48%	24%	0%	9% 8%	2%	
			48% 44%					
82 83	22% 21%	20% 19%	44%	20% 19%	0% 0%	8% 7%	2% 2%	
84	21%	19%	41%	18%	0%	7% 6%	2% 2%	
85 86	19%	18%	38%	17%	0%	5%	1%	
86 97	19%	17%	35%	17%	0%	4%	1%	
87	17%	17%	34%	16%	0%	3%	1%	
88	17%	16%	32%	15%	0%	2%	1%	
89	16%	14%	31%	14%	0%	2%	1%	
90	15%	14%	29%	14%	0%	2%	1%	
91	15%	13%	27%	13%	0%	2%	0%	
92	14%	13%	26%	13%	0%	1%	0%	
93	13%	12%	25%	12%	0%	1%	0%	
94	13%	12%	23%	12%	0%	1%	0%	
95	12%	12%	23%	11%	0%	1%	0%	
96	12%	11%	22%	11%	0%	1%	0%	
97	12%	11%	21%	10%	0%	1%	0%	
98	11%	10%	19%	10%	0%	1%	0%	
99	11%	10%	19%	9%	0%	1%	0%	
	_	10%	18%	9%	0%	1%	0%	

Full Benefit Increase Option Factors for Unlimited Benefit Periods \*

Issue	C:	nple	Com	oound	Step-Rate Tailored Compound			
	5%	3%	5%	3%	5%	5%	3%	
Age	3 /6	3 /0	3 /0	3 /0	3 /6	3 /6	3/0	
0	186%	100%	444%	201%	199%	92%	55%	
31	186%	100%	444%	201%	199%	92%	55%	
32	186%	100%	444%	201%	199%	92%	55%	
33	186%	100%	444%	201%	199%	92%	55%	
34	186%	100%	444%	201%	198%	92%	55%	
35	186%	100%	443%	201%	198%	92%	55%	
36	186%	100%	442%	200%	197%	92%	55%	
37	186%	100%	442%	199%	197%	92%	55%	
38	185%	100%	440%	198%	197%	92%	55%	
39	184%	100%	438%	197%	196%	92%	55%	
40	183%	100%	436%	196%	196%	92%	55%	
41	182%	100%	434%	195%	195%	92%	55%	
42	181%	100%	432%	194%	195%	92%	55%	
43	179%	99%	424%	191%	187%	91%	55%	
44	178%	99%	416%	188%	179%	90%	55%	
45	176%	99%	408%	185%	171%	89%	54%	
46	174%	98%	400%	182%	163%	88%	54%	
47	172%	98%	392%	179%	155%	87%	54%	
48	171%	96%	381%	176%	148%	85%	53%	
49	169%	94%	371%	173%	141%	84%	52%	
50	168%	91%	360%	170%	134%	82%	51%	
51	166%	89%	350%	167%	127%	81%	51%	
52	164%	87%	339%	164%	120%	79%	50%	
53	162%	85%	326%	160%	114%	76%	49%	
54	159%	84%	312%	156%	108%	73%	47%	
55	157%	83%	298%	152%	102%	70%	46%	
56	154%	81%	285%	148%	96%	67%	45%	
57	151%	80%	271%	144%	90%	64%	43%	
58	147%	78%	260%	139%	84%	61%	41%	
59	142%	77%	250%	134%	78%	57%	40%	
60	138%	75%	239%	128%	72%	54%	38%	
61	133%	73%	229%	123%	66%	50%	36%	
62	128%	72%	218%	118%	60%	47%	34%	
63	124%	70%	209%	113%	54%	43%	32%	
64	120%	68%	200%	109%	48%	38%	29%	
65	117%	66%	190%	104%	42%	34%	27%	
66	113%	64%	181%	100%	36%	30%	25%	
67	109%	63%	172%	95%	30%	25%	23%	
68	104%	60%	163%	91%	26%	24%	21%	
69	100%	58%	155%	87%	22%	22%	20%	
70	96%	56%	146%	83%	17%	21%	19%	
71	92%	54%	138%	79%	13%	20%	17%	
72	88%	51%	129%	75%	9%	18%	16%	
73	84%	49%	123%	72%	7%	17%	15%	
74	80%	47%	117%	69%	5%	16%	15%	
75	77%	45%	111%	66%	4%	15%	14%	
76	73%	43%	105%	63%	2%	14%	14%	
77	69%	41%	99%	60%	0%	13%	13%	
78	66%	39%	93%	57%	0%	12%	13%	
79	62%	37%	87%	53%	0%	12%	12%	
80	58%	35%	81%	50%	0%	11%	11%	
81	55%	33%	74%	46%	0%	10%	11%	
82	51%	31%	68%	42%	0%	10%	10%	
83	49%	29%	64%	40%	0%	8%	9%	
84	47%	29%	62%	38%	0%	7%	7%	
85	46%	27%	58%	36%	0%	6%	6%	
86	44%	25%	54%	36%	0%	5%	5%	
87	40%	25%	52%	33%	0%	3%	3%	
88	40%	23%	50%	31%	0%	3%	3%	
89	38%	22%	48%	29%	0%	3%	3%	
90	36%	22%	44%	29%	0%	2%	2%	
91	35%	20%	42%	27%	0%	2%	2%	
92	33%	20%	40%	27%	0%	2%	2%	
93	31%	18%	38%	25%	0%	2%	2%	
93 94	31%	18%	36%	25% 25%	0%	2% 2%	2% 2%	
95 96	29%	18%	36%	22%	0%	2%	2%	
96 07	27%	16%	34%	22%	0%	2%	2%	
97	27%	16%	32%	20%	0%	2%	2%	
98 99	26% 26%	14%	30%	20%	0%	2%	2%	
	1 2h%	14%	30%	18%	0%	2%	2%	

<sup>\*</sup> Benefit Periods between years are interpolated between full year benefit periods.
Unlimited is assumed to be 3650 days for purposes of interpolating.
This is consistent with the way Benefit Periods are interpolated on the Base Rates.
Inflation factors for Benefit periods between 5 years and Unlimited will be interpolated between the 5 year and these Unlimited Benefit Period factors.

 SERFF Tracking #:
 AEGB-133092985
 State Tracking #:
 AEGB-133092985
 Company Tracking #:
 HI372

State: Pennsylvania Filing Company: Transamerica Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

**Product Name:** HI372 - TLIC RINC 2021 - UNI2

Project Name/Number: Transam/77/77

#### **Supporting Document Schedules**

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P.O. Box 159 | Cedar Rapids, IA 52406 | transamerica.com

December 10, 2021

Re: Rate Increase Filing

Pennsylvania Department of Insurance

Policy Forms: UniProduct 2a Series ICC10 TLC-3

Attached is an actuarial memorandum and accompanying rates for the Company's proposed premium rate increase filing on the above-captioned policy forms and all accompanying riders.

At this time, the company is requesting a premium rate increase of 52.72% on the policy forms displayed above and all associated riders thereof. The justifiable rate increase calculation is shown in the attached Exhibit V. The approved rate increase will be implemented upon approval but will not become effective for any given policyholder until all statutory requirements are satisfied. If the requested rate increase is approved and implemented, no further premium rate schedule increases are anticipated as the underlying assumptions reflect moderately adverse conditions.

The attached actuarial memorandum includes the following experience exhibits:

Exhibit I Displays nationwide loss ratio experience by calendar year adjusted to the rate history of

this state in terms of timing and magnitude before and after application of the proposed rate increase assuming all policyholders subject to the filing pay the requested rate

increase

Exhibit II Displays nationwide actual-to-expected ("A/E") loss ratio experience by duration

adjusted to the rate history of this state in terms of timing and magnitude before

application of the proposed rate increase

The purpose of Exhibit I is to demonstrate compliance with the minimum loss ratio of this state as applicable. Exhibit II demonstrates how actual lifetime experience compares to expected experience per original pricing assumptions by duration, where actual experience consists of historical experience from inception to date combined with projected experience thereafter per current assumptions. In order to see a complete picture of how adverse experience impacts A/E loss ratios by duration for all factors combined, A/E cumulative loss ratios by duration are displayed in the last column of Exhibit II. The A/E cumulative loss ratios in the last column of Exhibit II capture the full impact of all factors, including lapse experience, and hence reveal a complete picture of the lifetime experience of this block by duration.

A Contingent Nonforfeiture Benefit, as required by NAIC Long-Term Care Insurance Model Regulation, will be offered to all insureds affected by the premium rate increase who allow their coverage to lapse within 120 days following the increase. Also, the Company will provide insureds with various downgrade options to maintain existing premium levels as the proposed premium rate increase becomes effective. In addition to the traditional downgrade options the Company has made available to policyholders subject to prior rate increase filings, such as changes in elimination period, benefit period, benefit amounts or a combination thereof, the Company intends to also make available to all policyholders a Benefit Reduction and Cost Sharing option to offset the rate increase premium. The company will offer these policyholders the option to completely avoid, or at least mitigate, paying the requested rate increase of this filing in return for agreeing to reduce all policy benefit amounts by an assigned Cost Sharing percentage and to pay the Cost Sharing percentage of covered charges plus all charges exceeding the reduced daily amount going forward. Furthermore, the Company has set up a customer service unit with a toll-free line that is dedicated to answering rate increase related questions policyholders may have and to facilitating changes in coverage if they so choose.

I look forward to your review of the proposed premium rate increase. Please do not hesitate to contact me with questions or concerns.

Sincerely,

Bred Robert

Brad Rokosh, ASA, MAAA Senior Director, Individual Solutions | Financial Assets | LTC



P.O. Box 159 | Cedar Rapids, IA 52406 | transamerica.com

# Actuarial Memorandum Policy Forms: ICC10 TLC-3 as UniProduct 2a Series Long Term Care Coverage

#### 1) Scope and Purpose

This rate filing is a request for a 52.72% increase in premium justified by the Prospective Present Value Approach, effective upon approval by the state, on the base policy and all associated riders for all policies. The justifiable rate increase calculation is shown in the attached Exhibit V.

If the requested rate increase is approved and implemented as proposed, the Company does not expect to request additional rate increases based on current expectations of future experience. If actual future experience were to deteriorate further, additional rate action may become necessary even if the requested rate increase is approved and implemented as proposed.

The purpose of this memorandum is to file revised premium rates. This memorandum is not to be used for other purposes.

The requested rate increase will take effect upon approval by the Department of Insurance subject to all notification requirements and premium rate guarantee periods. The requested premium rate increase is needed because experience has exceeded the margin for adverse experience included in the original pricing under the rate stability regulations.

#### Benefit Reduction and Cost Sharing Option (with Rate Guarantee)

The Company would also like to make available to all policyholders a Benefit Reduction and Cost Sharing option to help the customer offset some or all of the cost of the premium rate increase and receive a premium rate guarantee for a set number of years as outlined in Appendix A. The Company is filing a Benefit Reduction and Cost Sharing Endorsement that will be issued to the policyholder if they choose this option.

The Benefit Reduction and Cost Sharing option affects both:

- 1) The policy benefit limits available under the policy (by reducing all of the policy benefit limits available by the Cost Sharing Percentage), and
- 2) Amounts that the policyholder holder and the Company are responsible for with respect to each claim (by reducing the amounts that the Company will pay for claims by the Cost Sharing Percentage). If inflation protection coverage is included in the policy, all future benefit amount increases will be based on the new revised benefit amounts. The Benefit Reduction and Cost Sharing option also applies to all policy benefit provisions, including any benefit provision added by rider or endorsement. The Benefit Reduction and Cost Sharing option also applies to benefits for covered care or services received by another covered person who is covered under the policy.

Benefit Reduction and Cost Sharing percentages were determined to be actuarially equivalent to the requested rate increase – which includes the cost of the Rate Guarantee. Policyholders selecting the Benefit Reduction and Cost Sharing option will generally be able to completely or partially offset the requested rate increase and receive the Rate Guarantee. Some policyholders electing the Benefit Reduction and Cost Sharing option may not be able to completely offset the requested rate increase but would be able to mitigate it. Additional details regarding the Benefit Reduction and Cost Sharing option are shown in Appendix A.

Policyholders who elect the Benefit Reduction and Cost Sharing option may still be subject to future rate increases after the Rate Guarantee period has expired if additional rate increases become justified due to further deterioration of experience not currently anticipated.

#### 2) Benefits \*

#### **Base Benefits**

#### A. Long Term Care Facility Benefit

Once the Elimination Period has been met, the actual charges incurred for each day the Insured Person is confined to a Facility, as defined in the Policy, will be paid. Payments will be subject to the Maximum Daily Benefit.

#### B. Home Care and Adult Day Care Benefit

Once the applicable Elimination Period has been met, the actual charges incurred for each day the Insured Person receives Home Care and Adult Day Care, up to the Maximum Daily Benefit, will be paid.

#### C. Cash Benefit

Once an Insured Person has met the benefit eligibility, the insurer will pay the Monthly Benefit each calendar month. This benefit will be paid in lieu of all other benefits for care or services provided under this policy.

#### D. Waiver of Premium

Premiums will be waived on a monthly basis once the Elimination Period has been met and while the Insured Person is receiving Long Term Care Facility benefits.

#### **Inflation Options and Optional Benefits**

#### A. Additional Inflation optional benefits that were available:

Simple Benefit Increase Option, Compound Benefit Increase Option, Step-Rated Compound Benefit Increase Option, Tailored Benefit Increase Option, Full Simple Benefit Increase Option, Full Compound Benefit Increase Option, Full Step-Rated Compound Benefit Increase Option, Full Tailored Benefit Increase Option, Deferred Benefit Increase Option, Guaranteed Purchase Option.

#### B. Additional Optional Benefits that were available:

Monthly Benefit, Full Restoration of Benefits, Shared Care Benefit, Return of Premium Upon Death, Waiver of Premium for Home Care and Adult Day Care Benefit, Waiver of Premium for Cash Benefit, Joint Waiver of Premium Benefit, Non-Forfeiture Benefit, Accident Benefit, Return of Premium to Age 67.

<sup>\*</sup> This is not intended to be a comprehensive listing of all benefits available.

#### 3) Renewability

These policy forms are guaranteed renewable for life, subject to the company's right to change premium rates.

#### 4) Applicability

This filing applies to inforce insureds only for policy form ICC10 TLC-3 rates approved in 2011 and the historical and projected experience used in this filing is specific to business issued on this initial rate schedule. The projections used in the actuarial memorandum for this rate increase request only include policies written on form ICC10 TLC-3 with rates approved in 2011. Further, the projection only includes active policies that are premium paying or are limited-pay (but not single-pay) as well as policies that are on claim. Policies under this rate schedule were issued until July 2013. The premium change will be applicable to the base rates. There will be no change to the original factors that are applied to the base rates.

#### 5) Morbidity

Morbidity assumptions are developed using internal company experience looking across multiple variables. The assumptions for incidence, recovery, on-claim mortality, utilization, and transition generally vary on variables such as marital status, gender, implied elimination period, benefit period, benefit package, policy inflation option, issue age, attained age, issue year, and calendar year. A provision for morbidity improvement is also included.

#### 6) Off-Claim Mortality

Off-claim, or active life, mortality assumptions are developed using internal company experience and vary based on attained age, issue year, gender and marital status. The rates are further adjusted by 15 years of improvement factors that vary by gender.

#### 7) Persistency

Voluntary lapse rates are based on Company experience and vary by duration, issue age, marital status, service group, and policy inflation option.

#### 8) Expenses

Expenses have not been included in the requested rate increase justification. It is assumed the originally filed expense assumptions remain appropriate.

#### 9) Marketing

These policy forms were marketed by agents to individuals in age ranges that vary by policy form.

#### 10) Policy Design

Policy design features have been taken into consideration. Benefit provisions, exclusions, elimination periods, benefit periods, number of units, benefit growth, etc. have been accounted for either the development of claim costs or projection model formulas.

#### 11) Underwriting

These policy forms were fully underwritten with the use of various underwriting tools in addition to the application, which may have included medical records, an attending physician's statement, telephone interview and/or face-to-face assessment.

#### 12) Claims Adjudication Practice

No significant changes to the standard operating practices of the Claims Department have been necessary to date nor are any changes expected to be necessary in the future. The claim adjudication staff has maintained a consistently high degree of expertise, experience, and performance over the life of these policy forms and this is expected to continue in the future. Therefore, special adjustments due to claim adjudication practice have not been incorporated into the projection.

#### 13) Premiums

Premiums vary based on original issue age, rate class, and benefit options selected.

#### 14) Issue Age Range

Applicants age 18 years and older were eligible for all elimination periods and benefit periods.

#### 15) Limited Pay

Limited pay policies excluding single pay policies have been included in the data underlying our exhibits. As of 10/31/2021, there were 153 single pay policies that are still active. Only premium paying policies were used to calculate the justified increase.

#### 16) Area Factors

Area factors are not used for these products.

#### 17) Average Annual Premium

Before increase: \$2,219. After increase: \$3,389

#### 18) Premium Modalization Rules

Modal factors which are applied to the annual premium are no greater than as follows:

Annual	1.000
Semi-annual	.520
Quarterly	.265
Monthly	.090

#### 19) Claim Liability and Reserve

The present value of amounts not yet due (Exhibit 6) is calculated for all open claims using termination rates derived from company experience. The resulting reserve is adjusted by factors based on age at incurral, gender, and benefit period developed from company experience. The interest rate varies by year of incurral. The incurred but not reported and in course of settlement reserves are calculated based on the development of incurred claims by month of incurral, based on internal Company data. The claim reserves underlying the incurred

claims in the projection are consistent with the reserves reported in Exhibits 6 and 8 of the Company's financial statement.

#### 20) Active Life Reserve

Active life reserves have not been used in this rate filing to demonstrate compliance with the minimum loss ratio requirement. The inclusion of active life reserves would result in a larger justifiable rate increase based on loss ratios and actual-to-expected projections.

#### 21) Trend Assumptions

As this is not medical insurance, we have not included any explicit medical cost trends in the projections.

#### 22) Anticipated Loss Ratio

The original anticipated lifetime loss ratio for this book of business is shown in Exhibit II.

#### 23) Distribution of Business

See Attachment A.

#### 24) Margin for Moderately Adverse Conditions

Actual historical experience combined with revised assumptions for morbidity and persistency have resulted in lifetime expected loss ratios significantly greater than those anticipated at the time of original pricing. The enclosed Exhibit II shows that the projected lifetime Actual to Expected Incurred Claims is 158.0%, which exceeds the original pricing margin.

#### 25) Experience on the Form

The enclosed Exhibit I shows that more than 63.8% of historical and projected current premiums are paid out as claims and that more than 85% of the proposed rate increased premium portions are paid out as claims. The 63.8% represents the original pricing loss ratio under the current distribution of business for this policy form. A 10% margin for future adverse claims experience is included in the exhibit.

See Exhibit I for nationwide calendar year historical experience through December 31, 2020, as well as projected experience thereafter both with and without the proposed rate increase where all policyholders are assumed to pay the increase under the 'with proposed rate increase' scenario.

See Exhibit II for nationwide actual-to-expected experience by duration where 'actual' experience includes historical experience through December 31, 2020. Historical Incurred Claims reflect claim payment runoff through March 31, 2021 plus the claim reserve estimate as of March 31, 2021 (as described in Section 19 above).

#### 26) History of Rate Adjustments

A rate increase of 20% was approved in 2019 and implemented in 2020.

#### 27) Number of Policyholders

As of October 31, 2021, the number of policies that will be affected by this increase is:

	Insureds	Annualized
		Premium
Pennsylvania	259	\$ 621,877
Nationwide	8,324	\$18,473,902

#### 28) Proposed Effective Date

The proposed rate increase will be implemented following approval and after fulfillment of all statutory and contractual requirements. The increase for any policyholder will not become effective until a period of one year has elapsed since the previously approved rate increase effective date if applicable.

#### 29) Actuarial Certification

I certify that to the best of my knowledge and judgment, the entire rate filing is in compliance with the applicable laws of this state and with the rules of the Department of Insurance, and complies with Actuarial Standard of Practice No 8. I certify that the proposed premium rate schedule is not excessive or discriminatory when compared to the current expectations of benefits to be paid. This filing will enhance premium adequacy, although the company reserves the right to take additional rate action as future experience justifies.

Brad Rokosh, ASA, MAAA

Bred Robert

Senior Director, Individual Solutions | Financial Assets | LTC

#### Attachment A

#### Distribution of Business

By Issue Age

0 to 44	10.8%
45 to 49	8.9%
50 to 54	17.4%
55 to 59	25.4%
60 to 64	21.6%
65 to 69	11.5%
70 to 74	3.9%
75 +	0.5%

By Maximum Benefit Option

≤ 2 Yr	3 Yr	4 Yr	5 Yr	≥ 6 Yr
12.9%	50.5%	15.1%	18.3%	3.2%

By Benefit Increase Option

Compound 5%	18.8%
Compound 3%	49.9%
Simple 5%	0.2%
Tailored	0.9%
No BIO	23.5%
Step Rated 3%	5.8%
Step Rated 5%	0.9%

#### Appendix A

#### Benefit Reduction and Cost Sharing Option (with Rate Guarantee)

The Benefit Reduction and Cost Sharing Endorsement (the "Endorsement") consists of three components:

 Reduction to all policy benefit amounts, including but not limited to the Maximum Daily Benefit, Maximum Monthly Benefit and the policy Maximum Amount

All policy benefit amounts (including, but not limited to, all Maximum Daily/Monthly Benefit amounts and the policy Maximum Amount) in effect immediately prior to the Endorsement effective date will be reduced by an amount equal to the Cost Sharing Percentage.

#### For example:

If the policy Maximum Amount is \$100,000 and the Cost Sharing Percentage is 20%, the policy Maximum Amount will be reduced to \$80,000. The Company will not be responsible for any costs that exceed the reduced policy Maximum Amount.

If the Maximum Daily Benefit amount is \$100, and the Cost Sharing Percentage is 20%, the Maximum Daily Benefit amount will be reduced to \$80. The Company will not be responsible for any daily costs that exceed the reduced Maximum Daily Benefit.

The dollar amount and percentages used in these examples may be different from the actual dollar amounts and percentages that apply to the policy.

#### 2. Application of Cost Sharing to Claim Payments

As long as all policy provisions and conditions are satisfied, for any benefit for which a claim is made under the policy, the Company will pay its Cost Sharing Percentage of such benefit, but the Company will pay no more than the applicable Maximum Daily/Monthly Benefit amounts as shown on the Endorsement. The policyholder holder will be responsible for paying the remaining portion of the applicable long term care expenses associated with such claim. Note that only amounts paid by the Company will be deducted from the revised policy Maximum Amount.

For example: If the revised Maximum Daily Benefit for a covered Long Term Care Facility is \$80 and the Company's Cost Sharing Percentage is 80%, the Company will pay 80% of the Long Term Care Facility charges, but no more than \$80. Using the same formula:

- If the Long Term Care Facility charges are \$80, the Company will pay \$64 and the policyholder holder will be responsible for \$16.
- If the Long Term Care Facility charges are \$100, the Company will pay \$80 and the policyholder holder will be responsible for \$20.
- If the Long Term Care Facility charges are \$200, the Company will pay \$80 and the policyholder holder will be responsible for \$120.

#### 3. Rate Guarantee

Premium rates for the policy will be guaranteed from the effective date of the Endorsement for 5 years. The policy will be excluded from any future increases until after the Rate Guarantee has expired. Any benefits added to the policy after the effective date of the Endorsement will not be covered by the Rate Guarantee.

#### Exhibit I

#### Transamerica Life Insurance Company

Policy Forms: ICC10 TLC-3 UniProduct 2a Series

Nationwide Experience Adjusted to Pennsylvania-Specific Rate History

All Policyholders Pay the Requested Increase

		rned mium	Incurred Claims	Loss Ratios Excluding Change in ALR		LR	
	Actual Past & Projected Future w/o Proposed	Actual Past & Projected Future w/ Proposed Rate	Actual Past & Projected	Actual w/o Rate	Actual w/ Rate	PV Actual Cumulative w/o Rate	PV Actual Cumulative w/ Rate
Year	Rate Increase	Increase	Future	Increase	Increase	Increase	Increase
2011	306,852	306,852	0	0.0%	0.0%	0.0%	0.0%
2012	9,711,387	9,711,387	1,849	0.0%	0.0%	0.0%	0.0%
2013	21,044,434	21,044,434	537,556	2.6%	2.6%	1.7%	1.7%
2014	20,596,180	20,596,180	452,220	2.2%	2.2%	1.9%	1.9%
2015	20,567,686	20,567,686	415,264	2.0%	2.0%	1.9%	1.9%
2016	20,488,738	20,488,738	1,134,031	5.5%	5.5%	2.7%	2.7%
2017	20,026,627	20,026,627	755,527	3.8%	3.8%	2.9%	2.9%
2018	19,407,520	19,407,520	1,368,177	7.0%	7.0%	3.4%	3.4%
2019 2020	19,202,610	19,202,610	1,336,840	7.0% 10.4%	7.0% 10.4%	3.8% 4.4%	3.8% 4.4%
2020	19,576,978 20,801,144	19,576,978	2,039,882	19.3%	19.3%		5.8%
2021	18,969,848	20,801,144 21,448,705	4,019,930 4,754,116	25.1%	22.2%	5.8% 7.2%	7.2%
2022	17,198,138	26,151,933	5,617,911	32.7%	21.5%	8.8%	8.4%
2023	16,837,273	25,569,365	6,641,137	39.4%	26.0%	10.4%	9.8%
2024	16,457,979	24,960,861	7,832,822	47.6%	31.4%	12.2%	11.2%
2025	16,060,186	24,322,929	9,136,308	56.9%	37.6%	14.2%	12.8%
2027	15,647,263	23,662,335	10,632,264	67.9%	44.9%	16.3%	14.5%
2028	15,191,055	22,935,070	12,374,420	81.5%	54.0%	18.5%	16.3%
2029	14,702,404	22,156,988	14,261,532	97.0%	64.4%	21.0%	18.3%
2030	14,195,101	21,350,929	16,148,094	113.8%	75.6%	23.7%	20.4%
2031	13,649,366	20,488,015	17,911,277	131.2%	87.4%	26.4%	22.7%
2032	13,086,367	19,601,842	19,753,187	150.9%	100.8%	29.3%	25.0%
2033	12,506,935	18,693,392	21,566,500	172.4%	115.4%	32.3%	27.4%
2034	11,910,240	17,762,195	23,124,569	194.2%	130.2%	35.3%	29.8%
2035	11,295,344	16,807,004	24,751,048	219.1%	147.3%	38.4%	32.2%
2036	10,666,601	15,833,966	26,319,895	246.8%	166.2%	41.5%	34.7%
2037	10,033,661	14,857,539	27,934,077	278.4%	188.0%	44.7%	37.3%
2038	9,397,712	13,878,799	29,434,139	313.2%	212.1%	47.9%	39.8%
2039	8,760,759	12,901,742	30,525,598	348.4%	236.6%	51.1%	42.4%
2040	8,125,712	11,931,920	31,250,059	384.6%	261.9%	54.2%	44.9%
2041	7,499,007	10,979,638	31,684,058	422.5%	288.6%	57.2%	47.3%
2042	6,886,230	10,053,101	31,976,778	464.4%	318.1%	60.2%	49.6%
2043	6,291,069	9,156,822	32,087,603	510.1%	350.4%	63.0%	51.9%
2044	5,716,193	8,294,663	31,786,160	556.1%	383.2%	65.7%	54.1%
2045	5,165,893	7,473,316	31,060,546	601.3%	415.6%	68.2%	56.1%
2046 2047	4,643,240	6,697,145	30,028,765	646.7% 695.2%	448.4%	70.6% 72.8%	58.0% 59.7%
2047	4,150,791 3,690,049	5,969,499 5,291,634	28,854,272 27,592,528	747.8%	483.4% 521.4%	74.8%	61.3%
2049	3,262,787	4,665,684	26,123,126	800.6%	559.9%	76.6%	62.8%
2049	2,869,221	4,005,064	24,466,089	852.7%	598.0%	78.3%	64.1%
2050	2,509,680	3,569,374	22,678,459	903.6%	635.4%	79.7%	65.3%
2052	2,184,121	3,098,649	20,850,341	954.6%	672.9%	81.0%	66.4%
2053	1,891,403	2,677,223	19,091,986	1009.4%	713.1%	82.2%	67.3%
2054	1,630,286	2,302,816	17,375,620	1065.8%	754.5%	83.2%	68.1%
2055	1,398,899	1,972,282	15,723,933	1124.0%	797.2%	84.1%	68.8%
2056	1,195,400	1,682,558	14,148,915	1183.6%	840.9%	84.8%	69.5%
2057	1,017,838	1,430,536	12,672,286	1245.0%	885.8%	85.5%	70.0%
2058	863,851	1,212,536	11,334,672	1312.1%	934.8%	86.1%	70.5%
2059	730,901	1,024,692	10,125,601	1385.4%	988.2%	86.6%	70.9%
2060	616,712	863,588	9,026,432	1463.6%	1045.2%	87.0%	71.29
2061	518,964	725,807	8,016,040	1544.6%	1104.4%	87.3%	71.5%
2062	435,731	608,603	7,100,967	1629.7%	1166.8%	87.6%	71.79
2063	364,997	509,083	6,292,639	1724.0%	1236.1%	87.9%	72.0%
2064	304,984	424,709	5,567,432	1825.5%	1310.9%	88.1%	72.1%
2065	254,240	353,421	4,905,479	1929.5%	1388.0%	88.3%	72.3%
2066	211,385	293,262	4,310,008	2038.9%	1469.7%	88.5%	72.49
2067	175,273	242,621	3,766,629	2149.0%	1552.5%	88.6%	72.5%
2068	144,931	200,125	3,279,230	2262.6%	1638.6%	88.7%	72.6%
2069	119,450	164,495	2,844,338	2381.2%	1729.1%	88.8%	72.7%
2070+	492,708	669,627	14,184,033	2878.8%	2118.2%	89.2%	73.0%
AV D :	400 500 0	400 500 5	0.070.0				
AV Past	199,539,986	199,539,986	8,873,889	4.4%	4.4%		
PV Future	220,793,086	314,018,689 513 558 675	366,182,944	165.8%	116.6%		
PV Litetime	4つり さささ りょう	512 552 67E					

#### Post Rate-Stability Calculations

420,333,072

PV Lifetime

126,780,594 Present value of initial earned premium times 63.79% A =

B = 661,005 Present value of prior premium rate increases times 85%

513,558,675

C = 118,656,458 Present value of future projected initial earned premium times 63.79% D =  $108,\!794,\!136\,\,Present\,\,value\,\,of\,\,future\,\,projected\,\,earned\,\,premium\,\,from\,\,rate\,\,increases\,\,times\,\,85\%$ 

354,892,194 A+B+C+D =

375,056,833 Present value of incurred claims + present value of future projected incurred claims

375,056,833

89.2%

73.0%

66.1% Post Rate-Stability method Rate Increase

Present value of incurred claims + present value of future projected incurred claims is not less than A+B+C+D

#### Exhibit II

# Transamerica Life Insurance Company Policy Forms: ICC10 TLC-3 UniProduct 2a Series Nationwide Experience Adjusted to Pennsylvania-Specific Rate History Actual To Expected Lifetime Experience Actual Nationwide Experience Through 12/31/2020 and Projected Thereafter

		Δα	tual			Expected		Λ.	tual to Expect	ed
	A	В	С	D	Е	F	G	H=A/E	I=C/F	J=D/G
		Earned	_		_				Actual to	
		Premium				Incurred	Cumulative		Expected	
	Earned	Adjusted To	Incurred	Cumulative	Earned	Claims	Loss Ratio	Actual to	Incurred	Cumulative
	Premium @	Approved	Claims	Loss Ratio	Premium @	Excluding	Excluding	Expected	Claims	Loss Ratio
	Original Rate	Pennsylvania	Excluding	Excluding	Original Rate	ALR	ALR	Earned	Excluding	Excluding
Duration	Level	Rate History	ALR Increase	ALR Increase	Level	Increase	Increase	Premium	ALR Increase	ALR Increase
1	21,784,904	21,784,904	241,431	1.1%	21,728,332	487,644	2.2%	100.3%	49.5%	49.4%
2	21,942,937	21,942,937	302,364	1.2%		676,900	2.7%	106.0%	44.7%	45.4%
3	21,135,070	21,135,070	464,494	1.5%		812,947	3.1%	105.9%	57.1%	49.0%
4	20,695,595	20,695,595	823,906	2.1%		972,985	3.6%	106.8%	84.7%	58.8%
5	20,155,158	20,161,041	1,186,955	2.8%		1,216,158	4.1%	106.7%	97.6%	68.0%
6	19,534,806	19,603,844	981,167	3.1%		1,475,056	4.6%	110.0%	66.5%	66.4%
7	19,181,334	19,323,945	1,581,026	3.7%		1,812,463	5.3%	110.5%	87.2%	69.6%
8	18,734,208	19,046,615	1,387,142	4.0%		2,225,148	6.0%	110.7%	62.3%	66.9%
9	16,643,417	18,642,560	2,866,107	5.0%		2,666,805	6.9%	102.5%	107.5%	73.0%
10	17,185,469	20,524,619	4,379,274	6.4%		3,153,175	7.8%	108.4%	138.9%	81.9%
11	14,496,045	17,357,279	5,174,466	7.9%		3,706,793	8.8%	93.6%	139.6%	89.6%
12 13	14,227,080	17,024,137	6,083,602	9.5%		4,363,334	9.9%	96.5% 97.1%	139.4%	95.4% 100.3%
14	13,929,408 13,619,659	16,655,245 16,271,909	7,226,861 8,526,700	11.2% 13.1%	14,347,763 13,871,326	5,084,097 5,785,315	11.2% 12.5%	98.2%	142.1% 147.4%	100.3%
15	13,296,873	15,872,874	9,866,790	15.1%		6,538,010	13.8%	99.1%	150.9%	104.9%
16	12,954,556	15,450,495	11,536,436	17.3%	13,026,711	7,373,815	15.3%	99.1%	156.5%	112.7%
17	12,562,214	14,967,628	13,413,473	19.7%	12,621,710	8,408,886	16.9%	99.5%	159.5%	116.3%
18	12,163,878	14,477,145	15,448,168	22.3%	12,120,101	9,579,760	18.6%	100.4%	161.3%	119.5%
19	11,739,397	13,955,794	17,320,164	25.0%	11,711,627	10,682,768	20.5%	100.2%	162.1%	122.2%
20	11,277,305	13,390,360	18,997,408	27.9%	11,210,724	11,759,716	22.4%	100.6%	161.5%	124.4%
21	10,807,502	12,816,887	21,049,366	30.9%	10,654,943	12,833,241	24.4%	101.4%	164.0%	126.5%
22	10,321,710	12,225,394	22,718,231	33.9%	10,157,664	14,059,909	26.5%	101.6%	161.6%	128.0%
23	9,819,811	11,616,184	24,277,421	37.0%	9,640,935	15,318,019	28.7%	101.9%	158.5%	129.1%
24	9,301,072	10,988,202	25,888,932	40.1%	9,094,191	16,397,682	30.9%	102.3%	157.9%	129.9%
25	8,771,909	10,349,059	27,394,222	43.3%	8,564,323	17,274,806	33.1%	102.4%	158.6%	130.7%
26	8,242,542	9,710,622	29,161,146	46.5%	8,056,199	18,018,834	35.4%	102.3%	161.8%	131.6%
27	7,708,144	9,067,060	30,448,679	49.8%	7,562,254	18,732,395	37.6%	101.9%	162.5%	132.4%
28	7,174,245	8,425,642	31,298,074	53.0%	7,064,424	19,357,003	39.8%	101.6%	161.7%	133.0%
29	6,641,100	7,786,995	31,806,483	56.0%	6,565,870	19,726,750	42.0%	101.1%	161.2%	133.6%
30	6,116,791	7,160,902	32,044,115	59.0%	6,069,893	19,776,518	44.0%	100.8%	162.0%	134.1%
31	5,606,048	6,552,561	32,359,071	61.9%	5,580,007	19,586,605	46.0%	100.5%	165.2%	134.7%
32	5,109,536	5,962,399	32,262,159	64.7%	5,099,979	19,264,850	47.9%	100.2%	167.5%	135.2%
33	4,631,381	5,395,512		67.3%	4,633,445	18,847,479	49.6%	100.0%	167.9%	135.8%
34	4,174,709	4,855,631	30,687,588	69.8%	4,183,733	18,282,187	51.2%	99.8%	167.9%	136.2%
35	3,741,796	4,345,336	29,441,476	72.0%	3,754,051	17,477,267	52.7%	99.7%	168.5%	136.6%
36 37	3,335,351 2,955,608	3,867,495 3,422,014	28,250,047 26,849,091	74.1% 76.0%	3,347,178 2,965,471	16,538,079 15,534,755	54.1% 55.3%	99.6% 99.7%	170.8% 172.8%	137.0% 137.4%
38	2,933,606	3,422,014	25,218,237	77.8%		14,528,033	56.4%	99.8%	172.6%	137.4%
39	2,282,506	2,635,163	23,462,480	79.3%	2,282,886	13,549,991	57.4%	100.0%	173.0%	137.6%
40	1,989,434	2,033,703	21,559,987	80.7%	1,984,172	12,495,728	58.3%	100.3%	173.2%	138.3%
41	1,724,984	1,986,438	19,767,439	81.9%	1,714,910	11,406,336	59.1%	100.5%	173.3%	138.5%
42	1,488,062	1,711,679	18,017,944	83.0%	1,474,013	10,364,721	59.1%	101.0%	173.8%	138.7%
43	1,277,432	1,467,921	16,312,053	83.9%	1,260,098	9,406,821	60.4%	101.4%	173.4%	138.9%
44	1,091,587	1,253,233	14,710,759	84.7%	1,070,916	8,581,418	60.9%	101.9%	171.4%	139.0%
45	928,929	1,065,626	13,158,935	85.4%	906,542	7,765,604	61.4%	102.5%	169.5%	139.1%
46	787,622	902,875	11,764,312	86.0%	764,234	6,993,433	61.8%	103.1%	168.2%	139.1%
47	665,531	762,409	10,501,881	86.5%	641,785	6,261,522	62.1%	103.7%	167.7%	139.2%
48	560,552	641,737	9,354,713	87.0%	536,558	5,582,795	62.4%	104.5%	167.6%	139.2%
49	470,735	538,558	8,301,578	87.3%	445,649	4,996,594	62.7%	105.6%	166.1%	139.3%
50	394,252	450,748	7,330,362	87.7%	369,741	4,406,281	62.9%	106.6%	166.4%	139.3%
51	329,400	376,336	6,478,801	87.9%	305,539	3,815,937	63.1%	107.8%	169.8%	139.3%
52	274,498	313,364	5,720,754	88.2%	251,421	3,244,324	63.3%	109.2%	176.3%	139.4%
53	228,170	260,250	5,036,016	88.4%	205,711	2,714,768	63.4%	110.9%	185.5%	139.4%
54	189,180	215,568	4,405,279	88.5%	166,940	2,265,534	63.5%	113.3%	194.4%	139.5%
55	156,427	178,056	3,833,681	88.7%	135,465	1,867,887	63.5%	115.5%	205.2%	139.5%
56	128,996	146,667	3,330,572	88.8%	109,145	1,512,832	63.6%	118.2%	220.2%	139.6%
57	106,069	120,456	2,881,754	88.9%	87,120	1,200,883	63.7%	121.8%	240.0%	139.6%
58	86,925	98,590	2,488,718	89.0%	68,770	936,586	63.7%	126.4%	265.7%	139.7%
59	70,995	80,413	2,130,859	89.0%	53,203	748,665	63.7%	133.4%	284.6%	139.7%
60+	279,727	315,321	9,824,668	89.3%		2,240,114	63.8%	182.0%	438.6%	140.0%
PV Lifetime	276,666,671	302,237,717	269,890,813	89.3%	267,731,503	170,772,593	63.8%	103.3%	158.0%	140.0%

#### Exhibit V

## Transamerica Life Insurance Company Policy Forms: ICC10 TLC-3 UniProduct 2a Series

Pennsylvania Prospective Present Value Approach\*

Input		
A	Cumulative Rate Increase	19.8%
В	PV Future Incurred Claims (Current Assumption)	344,396,961
С	PV Future Earned Premium Adjusted To Approved Pennsylvania Rate History (Current Assumption)	222,277,704
D	PV Future Effective Earned Premium Adjusted To Approved Pennsylvania Rate History (Current Assumption)	187,637,969
E	PV Future Incurred Claims (Prior Assumption)	302,954,064
F	PV Future Earned Premium Adjusted To Approved Pennsylvania Rate History (Prior Assumption)	228,395,793
Calculation		
G = B - E	Change in PV Future Incurred Claims	41,442,897
H = C - F	Change in PV Future Earned Premium	(6,118,089)
$I = \frac{G - \frac{(0.638 + 0.85 \times A)}{1 + A} \times H}{0.85 \times D}$	Maximum Allowable Rate Increase	28.57%
Catch-up Provision		
J	AV Past Prem Requested	200,409,194
K	AV Past Prem Approved	199,539,986
L	PV Future Prem Requested (Prior Assumption)	272,843,307
$M = \frac{(J-K) + (L-F)}{D}$	Catch-up Provision Rate Increase	24.15%
	Total RINC	52.72%

<sup>\*</sup> Only premium paying policies of the referenced policy form series are included in calculation.

#### **Exhibit VI**

## Transamerica Life Insurance Company Policy Forms: ICC10 TLC-3 UniProduct 2a Series

#### Blended If-Knew / Make-Up Approach (Minnesota method)\*

Input		·
A	PV Lifetime Incurred Claims	375,056,83
В	PV Future Effective Earned Premium @ Original Rate Level	158,166,04
С	PV Lifetime Earned Premium @ Original Rate Level	384,787,92
D	AV Past Earned Premium Adjusted To Approved Pennsylvania Rate History	232,695,10
E	Statutorily Required Minimum Lifetime Loss Ratio	60.09
F	% of Active Policyholders Remaining	74.19
G	Cumulative Rate Increase	19.809
	Blended Increase	Policyholder Share of the Increas
H1	0-15%	100.00%
H2	15-50%	90.00%
H3	50-100%	75.00%
H4	100-150%	65.00%
H5	>150%	50.00%
Calculation		
I=(A/E)/C-1	If-Knew Increase	62.59
J=(A/E-D)/B-1	Make-Up Increase	148.19
K=I*(1-F)+J*F	Blended Increase	125.9%
	Cost-Sharing Increase	
L1=Min(K,15%)*H1	0-15%	15.00%
L2=(Min(K,50%)-Min(K,15%))*H2	15-50%	31.50%
L3=(Min(K,100%)-Min(K,50%))*H3	50-100%	37.50%
L4=(Min(K,150%)-Min(K,100%))*H4	100-150%	16.84%
L5=(K-Min(K,150%))*H5	>150%	0.00%
L=L1+L2+L3+L4+L5	Total	100.849

Maximum Allowable Rate Increase

M=(1+L)/(1+G)-1

<sup>\*</sup> Based off of Exhibit I



January 04, 2021

To: The Insurance Commissioner

#### **Authorization**

This letter, or a copy thereof, will authorize the consulting firm of First Consulting & Administration, Kansas City, Missouri, to represent the following companies in the submission of filings and to negotiate with insurance departments for their approval of such filings.

Transamerica Life Insurance Company
Transamerica Financial Life Insurance Company
Transamerica Premier Life Insurance Company
Transamerica Casualty Insurance Company
Transamerica Casualty Insurance Company
Transamerica Casualty Insurance Company
Transamerica Casualty Insurance Company
NAIC: 468-86231
FEIN: 39-0989781
NAIC: 468-70688
FEIN: 36-6071399
NAIC: 468-66281
FEIN: 31-4423946

This Authorization shall be valid until revoked by us.

Sincerely,

Douglas Simino

Vice President - Contract Development and Filing

Doug.Simino@Transamerica.com